



Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036-6797
+1 212 698 3500 Main
+1 212 698 3599 Fax
www.dechert.com

August 1, 2024

VIA ECF

Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Jane Street Group LLC v. Millennium Management LLC*, 24 C 2783 (PAE),
**LETTER MOTION TO SEAL CERTAIN MATERIALS IN MILLENNIUM'S
OPPOSITION TO JANE STREET'S MOTION TO COMPEL (D.I. 177)**

Dear Judge Engelmayer:

We represent Defendant Millennium Management LLC ("Millennium") in the above-referenced action. We write to request permission to redact certain materials that contain Millennium's and/or Jane Street's confidential, proprietary, commercially sensitive, or trade secret information in Millennium's opposition to Jane Street's letter motion to compel (D.I. 177) and Exhibits 1-3 to that letter (D.I. 177-1, 177-2, 177-3).

Millennium and Jane Street have agreed to redact competitively sensitive information that pertains to both parties' trading activity in the relevant market, proposed in highlighting as an attachment to this letter and identified in the table below:

Proposed Redactions	Explanation
Dkt. 177 at 2; Dkt. 177-1 at 1; Dkt. 177-2 at 2; Dkt. 177-3 at 2, 10 (third paragraph)	Discussion tending to reveal Millennium's and Jane Street's proprietary, competitively sensitive information
Dkt. 177-3 at 2	Discussion tending to reveal Millennium's and Jane Street's proprietary, competitively sensitive information
Dkt. 177-3 at 5	Discussion tending to reveal the nature of Jane Street's asserted trade secrets, including for example the trade secrets described at: Dkt. 147-8, at 9
Dkt. 177-3 at 7	Discussion tending to reveal the nature of Jane Street's asserted trade secrets, including for example the trade secrets described at: Dkt. 147-8, at 9

Proposed Redactions	Explanation
Dkt. 177-3 at 9	Discussion tending to reveal the nature of Jane Street's asserted trade secrets, including for example the trade secrets described at: Dkt. 147-8, at 2-9
Dkt. 177-3 at 10 (top)	Discussion tending to reveal the nature of Jane Street's asserted trade secrets, including for example the trade secrets described at: Dkt. 147-8, at 2-6
Dkt. 177-3 at 11	Discussion tending to reveal the nature of Jane Street's asserted trade secrets, including for example the trade secrets described at: Dkt. 147-8, at 7-9

These redactions are narrowly tailored to allow for public access to these documents while minimizing the competitive disadvantage to Millennium or Jane Street of their publication. *See Playtex Prods., LLC v. Munchkin, Inc.*, 2016 WL 1276450, at *11 (S.D.N.Y. Mar. 29, 2016) (redactions proper to protect party from being “competitively harmed”); *Dependable Sales & Serv., Inc. v. TrueCar, Inc.*, 311 F. Supp. 3d 653, 666 (S.D.N.Y. 2018) (redactions proper when public “would have information sufficient to understand the parties’ arguments and the Court’s adjudication”).

Millennium therefore respectfully requests permission to redact such information as previously permitted by the Court. *See, e.g.*, D.I. 123; D.I. 184.

Respectfully submitted,

/s/ May Chiang

May Chiang
Dechert LLP

cc: Deborah Brown, Quinn Emanuel, by ECF
Rollo Baker, Elsberg Baker & Maruri, by ECF

GRANTED.
SO ORDERED.

Paul A. Engelmayer

PAUL A. ENGELMAYER
United States District Judge

Date: August 1, 2024
New York, New York